REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed

December 9, 2003 (Paper No. 7). Upon entry of this response, claims 1-21 are pending in the

application. Claims 1, 5-6, 9-10, 13, and 15 have been amended, and claims 16-21 have been

added. Applicants assert that the amendments add no new subject matter to the present

application. Applicants respectfully request that the amendments being filed herewith be entered

and request that there be reconsideration of all pending claims.

1.   Rejection of Claims 1-15 under 35 U.S.C. §102

Claims 1-15 have been rejected under §102(a) as allegedly anticipated by *Carcerano*

(U.S. 6,308,205). Applicants respectfully traverse these rejections. A proper rejection of a claim

under 35 U.S.C. §102 requires that a single prior art reference disclose each element of the claim.

See, e.g., W.L. Gore & Assoc., Inc. v. Garlock, Inc., 721 F.2d 1540, 220 U.S.P.Q. 303, 313 (Fed.

Cir. 1983).

a. Claim 1

Applicants respectfully submit that *Carcerano* fails to teach, disclose or suggest at least

"a plurality of geographically separate web hosting facilities" as recited in claim 1. The Office

Action did not point to any particular passages in *Carcerano* that teach this limitation. The

Office Action only argued that "[a]s to claims 1-4 & 10-15, the claims are similar in scope to

claims 5-9, and they are rejected under the same rationale." (Office Action, p. 4, paragraph 9.)

However, the limitation "a plurality of geographically separate web hosting facilities" of

claim 1 is not present in claims 5-9, and Applicants cannot find any discussion in *Carcerano* of

web hosting facilities. The Examiner is therefore respectfully requested to point out with particularity the portion of *Carcerano* that teaches this limitation.

For at least the reason that *Carcerano* fails to disclose, teach or suggest "a plurality of geographically separate web hosting facilities," Applicants respectfully submit that *Carcerano* does not anticipate claim 1. Therefore, Applicants request that the Examiner's rejection of claim 1 be withdrawn.

b. Claims 2-4

Since claim 1 is allowable, Applicants respectfully submit that claims 2-4 are allowable for at least the reason that they each depend from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicants respectfully request that the rejection of claims 2-4 be withdrawn.

c. Claim 5

Applicants respectfully submit that *Carcerano* fails to teach, disclose, or suggest at least "storing, in a database, information related to the configuration of said servers, wherein each of said servers is used to host internet resources" as recited in amended claim 5.

Carcerano discloses a system that allows a remote network user to view and update the configuration of network devices by using a web browser on the user's workstation. (Col. 1, lines 60-65). As shown in FIG. 1, the system includes workstations 10 and 11, server 45 and managed network devices 16, 18, 19, and 20. Workstations 10 and 11 run the browser (83 in FIG. 3). Server 45 runs the network management system. (Col. 7, lines 55-60). Together, the server 45 and the workstations 10 and 11 are used to manage standalone "managed network devices such as scanner 16 which provides scanner services, and printers 18, 19 and 20 which provide printer services." (Col. 4, lines 8-10).

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In the following passage, *Carcerano* gives several examples of "managed network devices" and then <u>distinguishes</u> between these network devices and other devices attached to the network:

> Other managed network devices can be connected to each of the LANs, as indicated by the curved break lines shown at the ends of the LANs. Examples of such devices are facsimile machines, telephone controllers, digital cameras, and automated production and control devices used in manufacturing. These devices can be connected to the network 1 *along with other* workstations (including so-called thin and thick clients), servers, printers, scanners, modems, and the like in innumerable ways.

(Col. 5, lines 13-20). Thus, *Carcerano* does not teach "wherein each of said *servers* is used to host internet resources" as recited in claim 5.

When read as a whole, *Carcerano* teaches a system for managing network devices, where the network devices are specialized I/O devices such as printers, scanners, fax machines, *etc.* Applicants can find no suggestion in *Carcerano* that the network management system manages *servers "used to host internet resources,"* as recited in amended claim 5.

For at least the reason that *Carcerano* fails to disclose, teach or suggest "storing, in a database, information related to the configuration of said servers, wherein each of said servers is used to host internet resources," Applicants respectfully submit that *Carcerano* does not anticipate claim 5. Therefore, Applicants request that the Examiner's rejection of claim 5 be withdrawn.

d. Claim 6

Applicants respectfully submit that *Carcerano* fails to teach, disclose, or suggest at least "said server information web page includes information related to configuration of an application program" as recited in claim 6. The Office Action asserts that "status program of the server" in

Carcerano discloses this claimed limitation. (Office Action, p. 3, paragraph 5.) Applicants respectfully disagree.

In *Carcerano*, the web page generated by the network management server 104 is described as a "visual display representative of the status and **configuration of a targeted device or devices.**" (Col. 9, lines 45-50). However, Applicants can find no teaching anywhere in *Carcerano* of the web page including "information related to the configuration of **an application program**," as recited in claim 6.

For at least the reason that *Carcerano* fails to disclose, teach or suggest "said server information web page includes information related to configuration of an application program," Applicants respectfully submit that *Carcerano* does not anticipate claim 6. Furthermore, since claim 5 is allowable, Applicants respectfully submit that claim 6 is allowable for the additional reason that it depends from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicants request that the Examiner's rejection of claim 6 be withdrawn.

e. Claims 7-8

Since claim 5 is allowable, Applicants respectfully submit that claims 7-8 are allowable for at least the reason that they depend from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicants respectfully request that the rejection of claims 7-8 be withdrawn.

f. Claim 9

Applicants respectfully submit that *Carcerano* fails to teach, disclose, or suggest at least "linking, prior to entering said request, to a **service provider contact web page**" as recited in amended claim 9. The Office Action asserts that "*Carcerano* shows linking to a management

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contact web page (within the management server 45, see FIGs. 1 & 4." (Office Action, p. 3, paragraph 6.) Applicants respectfully disagree.

In *Carcerano*, the web page generated by the network management server 104 is described as a "visual display representative of the status and configuration of a targeted device or devices." (Col. 9, lines 45-50). *Carcerano* does not describe linking to a web page through which the user contacts a service provider, as in Applicants' claimed invention. (See Application, p. 18, lines 10-15.) In fact, Applicants can find no teaching anywhere in *Carcerano* that describes linking from the generated web page to any other web page.

For at least the reason that *Carcerano* fails to disclose, teach or suggest "linking, prior to entering said request, to a service provider contact web page," Applicants respectfully submit that *Carcerano* does not anticipate claim 9. Furthermore, since claim 5 is allowable, Applicants respectfully submit that claim 9 is allowable for at least the reason that it depends from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicants request that the Examiner's rejection of claim 9 be withdrawn.

g. Claim 10

Applicants respectfully submit that *Carcerano* fails to teach, disclose or suggest at least "a second database storing parameter information for application programs, said application programs running on said plurality of servers" as recited in amended claim 10. The Office Action did not point to any particular passages in *Carcerano* that teach this limitation. The Office Action only argued that "[a]s to claims 1-4 & 10-15, the claims are similar in scope to claims 5-9, and they are rejected under the same rationale." (Office Action, p. 4, paragraph 9.)

However, the limitation "a second database storing parameter information for application programs, said application programs running on said plurality of servers" of claim 10 is not

present in claims 5-9, and Applicants cannot find any discussion in *Carcerano* of a database which stores parameter information for application programs which run on servers. The only database discussed in *Carcerano* is one that stores configuration information for managed network devices. The Examiner is therefore respectfully requested to point out with particularity the portion of *Carcerano* that teaches this limitation.

For at least the reason that *Carcerano* fails to disclose, teach or suggest "a second database storing parameter information for application programs, said application programs running on said plurality of servers," Applicants respectfully submit that *Carcerano* does not anticipate claim 10. Therefore, Applicants request that the Examiner's rejection of claim 10 be withdrawn.

h. Claims 11-12

Since claim 10 is allowable, Applicants respectfully submit that claims 11-12 are allowable for at least the reason that they depend from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicants respectfully request that the rejection of claims 11-12 be withdrawn.

i. Claim 13

Applicants respectfully submit that *Carcerano* fails to teach, disclose or suggest at least "storing, in a centralized database, parameter information for application programs, said application programs running on said plurality of servers" as recited in amended claim 13. The Office Action did not point to any particular passages in *Carcerano* that teach this limitation. The Office Action only argued that "[a]s to claims 1-4 & 10-15, the claims are similar in scope to claims 5-9, and they are rejected under the same rationale." (Office Action, p. 4, paragraph 9.)

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However, the limitation "storing, in a centralized database, parameter information for application programs, said application programs running on said plurality of servers" of claim 13 is not present in claims 5-9, and Applicants cannot find any discussion in *Carcerano* of a database which stores parameter information for application programs which run on servers. The only database discussed in *Carcerano* is one that stores configuration information for managed network devices. The Examiner is therefore respectfully requested to point out with particularity the portion of *Carcerano* that teaches this limitation.

For at least the reason that *Carcerano* fails to disclose, teach or suggest "storing, in a centralized database, parameter information for application programs, said application programs running on said plurality of servers," Applicants respectfully submit that *Carcerano* does not anticipate claim 13. Therefore, Applicants requests that the Examiner's rejection of claim 13 be withdrawn.

j. Claims 14-15

Since claim 13 is allowable, Applicants respectfully submit that claims 14-15 are allowable for at least the reason that they depend from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed. Cir. 1988). Therefore, Applicants respectfully request that the rejection of claims 14-15 be withdrawn.

2. New Claims 16-21

New claims 16-21 are based on subject matter that is explicit and/or inherent within the description of the specification and/or the drawings. Applicants submit that no new matter has been added in these new claims and that the new claims are allowable over the cited prior art. Specifically, since claims 1, 5, and 10 are allowable for the reasons discussed above, Applicants respectfully submit that newly added claims 16-21 are allowable for at least the reason that each

depends from an allowable claim. *In re Fine*, 837 F.2d 1071, 5 U.S.P.Q. 2d 1596, 1598 (Fed.

Cir. 1988). Therefore, Applicants request the Examiner to enter and allow these new claims.
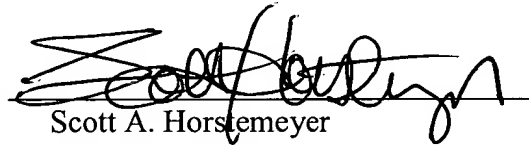
CONCLUSION

Applicants respectfully request that all outstanding objections and rejections be withdrawn and that this application and presently pending claims 1-21 be allowed to issue. If the Examiner has any questions or comments regarding Applicants' response, the Examiner is encouraged to telephone Applicants' undersigned counsel.

Respectfully submitted,

THOMAS, KAYDEN, HORSTEMEYER & RISLEY, L.L.P.

By: _____
Scott A. Horstemeyer
Reg. No. 34,183

100 Galleria Parkway, NW
Suite 1750
Atlanta, Georgia 30339-5948
Tel: (770) 933-9500
Fax: (770) 951-0933